

DISTRICT COURT, DENVER COUNTY, STATE OF COLORADO Denver District Court 1437 Bannock St. Denver, CO 80202 303.606.2433	DATE FILED: September 30, 2022 3:14 PM FILING ID: C37F6034818AC CASE NUMBER: 2018CV33011
<p>Plaintiff: Tung Chan, Securities Commissioner for the State of Colorado</p> <p>v.</p> <p>Defendants: Gary Dragul; GDA Real Estate Services, LLC; and GDA Real Estate Management, LLC</p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
<p>Attorneys for Receiver:</p> <p>Patrick D. Vellone, #15284 Michael T. Gilbert, #15009 Averil K. Andrews, # 56148 ALLEN VELLONE WOLF HELFRICH & FACTOR P.C. 1600 Stout St., Suite 1900 Denver, Colorado 80202 (303) 534-4499 pvellone@allen-vellone.com mgilbert@allen-vellone.com aandrews@allen-vellone.com</p>	<p>Case Number: 2018CV33011</p> <p>Division/Courtroom: 424</p>
<p style="text-align: center;">SEVENTH APPLICATION FOR PROFESSIONAL FEES AND EXPENSES</p>	

Harvey Sender, the duly-appointed receiver (“Receiver”) for the assets of Gary Dragul (“Dragul”), GDA Real Estate Services, LLC, GDA Real Estate Management, LLC, and related entities (collectively, “Dragul and the GDA Entities”), submits this Seventh Application for Professional Fees and Expenses (the “Application”), which covers the period from November 1, 2021, through August 31, 2022.

1. On August 15, 2018, Gerald Rome, Securities Commissioner for the State of Colorado (the “Commissioner”), filed his Complaint for Injunctive and Other Relief against Dragul and the GDA Entities.

2. On August 30, 2018, the Court entered its Order Appointing Receiver (“Receivership Order”), which appointed Harvey Sender Receiver for Dragul and the GDA Entities and related businesses.

3. The Receivership Order gives the Receiver the authority to “hire and pay general counsel, accounting, and other professionals as may be reasonably necessary to the proper discharge of the Receiver’s duties, and to hire, pay and discharge the personnel necessary to fulfill the obligations of the Receiver hereunder, including the retention of . . . other third parties to assist the Receiver in the performance of its duties hereunder, all within the Receiver’s discretion[.]” Receivership Order at 9, ¶ 13(l). The Receivership Order further authorizes the Receiver to retain counsel on a contingent fee basis after consultation with the Commissioner. *Id.* at 10, ¶ 13(o).

4. The Receiver hired Allen Vellone Wolf Helfrich & Factor P.C. (“Allen & Vellone”) as counsel in this and all related matters to provide legal services on an hourly fee-for-services basis, and notice thereof was provided on September 7, 2018. Effective November 1, 2019, the Receiver and Allen & Vellone agreed to modify its existing fee agreement so that Allen & Vellone would thereafter be compensated on a contingent fee basis for work performed in the Insider Case, the Family Case, and ancillary litigation, on the following terms: 25% of any recovery obtained before September 5, 2020; 38% of amounts recovered after September 5, 2020, through the filing of any appeal; and 45% of amounts recovered after any appeal; the Receivership Estate to pay the expenses incurred in litigation matters subject to the contingent fee agreement. The Commissioner approved the agreement, notice of which was provided to the Court and all parties-in-interest on May 11, 2020.

5. This Application covers the period from November 1, 2021, through August 31, 2022, and requests the following fees and expenses, which are specifically set forth in **Exhibits 1-4**:

PROFESSIONAL FEES AND EXPENSES INCURRED			
NOVEMBER 1, 2021 – AUGUST 31, 2022			
EX.	PROVIDER	DESCRIPTION	AMT. SOUGHT
1	Harvey Sender	Receiver	\$5,880.00 ¹
	Allen & Vellone	Counsel for the Receiver	
2		Hourly Fees - Main Receivership Case	\$15,525.00 ²
		Contingent Fee Insider Case	\$142,500.00 ³
3		Costs	\$2,159.78 ⁴
		Total	\$161,952.80
4	RubinBrown LLP		\$11,796.63 ⁵
Total			\$177,861.41

6. Effective February 28, 2021, the Estate had paid the following professional fees and expenses as detailed in the Receiver's first five fee applications: **First Application:** submitted December 6, 2018 (for the period August 30, 2018, through November 30, 2018); **Second Application:** submitted April 19, 2019 (for the period December 1, 2018, through March 31, 2019); **Third Application:** submitted November 14, 2019 (for the period April 1, 2019, through October 31, 2019); **Fourth Application,** submitted May 11, 2019 (for the period

¹ The Receiver has not billed for paralegal time spent on this case, effectively discounting fees by up to 25%.

² This reflects a discount of 15% of the actual time cost, which was \$18,264.50.

³ This is 38% of the \$375,000 received under the settlement with the Kahn Defendants in the Insider Case, which was approved by the Receivership Court on July 6, 2022.

⁴ This includes costs of \$1,025.80 incurred in the main Receivership Case and costs of \$1,133.98 in the Insider Case.

⁵ This includes costs of \$715.38. RubinBrown billed fees during the current application period were \$13,286.75; this application reflects a 17% discount. In addition, as a matter of practice, RubinBrown does not bill for significant time spent addressing administrative and operational matters or supervising junior staff.

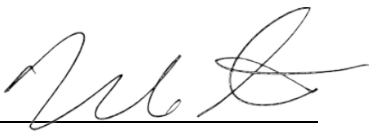
November 1, 2019, through March 31, 2020); **Fifth Application**: submitted March 9, 2021 (for the period April 1, 2020, through February 28, 2021); **Sixth Application**: submitted November 11, 2021 (for the period March 1, 2021, through October 31, 2021):

PROFESSIONAL FEES AND EXPENSES PAID		
AUGUST 30, 2018 – OCTOBER 31, 2021		
Provider	Description	Amount Paid
Harvey Sender	Receiver	\$535,048.36
Allen Vellone Wolf Helfrich & Factor P.C.	Counsel for the Receiver	\$1,812,058.54
RubinBrown LLP	Accountants (forensic accounting, expert witness, and tax preparation)	\$890,298.86
Waldrep LLP	North Carolina local counsel for the Receiver	\$10,611.85
Frost Brown Todd, LLC	Ohio local counsel for the Receiver	\$71,190.56
Revesco Property Services	Property manager (commercial and residential)	\$325,355.32
Kelly Reinhart	Accountant (former GDA accountant; tax preparation)	\$41,200.00
Total Professional Fees and Expenses		\$3,685,763.48

7. Pursuant to paragraph 10 of the Receivership Order, Court approval of any motion filed by the Receiver shall be given as a matter of course unless a party objects within ten days after service. This Application and its Exhibits are available at www.dragulreceivership.com.

Dated: September 30, 2022.

ALLEN VELLONE WOLF HELFRICH & FACTOR P.C.

By: /s/ Michael T. Gilbert 

Patrick D. Vellone
Michael T. Gilbert
Averil K. Andrews
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aandrews@allen-vellone.com

ATTORNEYS FOR THE RECEIVER

CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2022, a true and correct copy of the foregoing **Seventh Application for Professional Fees and Expenses** was filed and served via the Colorado Courts E-Filing system on all counsel of record and to the following:

Robert W. Finke
Janna K. Fischer
Ralph L. Carr Judicial Building
1300 Broadway, 8th Floor
Denver, Colorado 80203
Robert.Finke@coag.gov
Janna.Fischer@coag.gov

Paul L. Vorndran
Christopher S. Mills
JONES & KELLER, P.C.
1999 Broadway, Suite 3150
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***Tung Chan, Securities Commissioner
for the State of Colorado***

Counsel for Defendant Gary Dragul

CERTIFICATION OF E-SERVICE ON KNOWN CREDITORS

In accordance with this Court's February 1, 2019 Order clarifying notice procedures for this case, I also certify that a copy of the foregoing is being served by electronic mail on all currently known creditors of the Receivership Estate to the addresses set forth on the service list maintained in the Receiver's records.

By: /s/ Yvonne M. Davis *Yvonne M. Davis*
Allen Vellone Wolf Helfrich & Factor P.C.

Trustee: HARVEY SENDER, RECEIVER

Time Worksheet

Entries From 11/01/21 To 08/31/22

Case Number: 2018CV33011
Case Status: OPEN
Petition Date: 08/15/18

Case Name: GARY DRAGUL; GDA REAL ESTATE
Judge: SERVICES, LLC
Original 341a Meeting: BLANK - NO JUDGE

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Date	Description	Hours	Unit Rate	Total
Matter Code: Receiver Time				
11/10/21	Review draft of report. Provide comments to counsel and proposed changes.	0.50	400.00	200.00
01/13/22	Review and consider Freedom insurance litigation. Emails with counsel regarding above.	1.00	400.00	400.00
01/16/22	Review Clearwater report. Email comments.	0.50	400.00	200.00
01/22/22	Telephone conference with Eric and Michael regarding Kahn. Review and respond to emails regarding above.	0.50	400.00	200.00
03/02/22	Review and respond to various emails regarding Kahn settlement options. Review emails regarding Clearwater.	0.50	400.00	200.00
03/15/22	Several phone calls and emails with Eric Johnsen regarding offer. Telephone conference with Michael Gilbert regarding federal litigation.	0.60	400.00	240.00
04/05/22	Telephone conference with Eric Jonsen regarding Kahn offers.	0.50	400.00	200.00
04/19/22	Review and respond to emails regarding settlement offer on Kahn.	0.30	400.00	120.00
04/20/22	Review bankruptcy petitions for two Florida entities. Email comments to counsel.	0.50	400.00	200.00
04/21/22	Review latest settlement offer and attachments. Review and respond to various emails regarding above.	0.50	400.00	200.00
05/20/22	Review updated insurance response. Consider respond and email counsel.	0.40	400.00	160.00
05/24/22	Telephone conference with M. Gilbert and Eric Johnsen.	0.50	400.00	200.00
05/26/22	Telephone conference with Michael and Rachel regarding Clearwater. Review pleadings from the Bankruptcy Court and relevant receiver motions. Consider approach and discuss with counsel.	1.50	400.00	600.00
06/01/22	Review emails and attachments regarding tax return requests from Dragul. Conference call regarding production issues.	0.60	400.00	240.00
06/06/22	Review and respond to emails regarding Clearwater. Review extensive memo and attachments.	1.00	400.00	400.00
06/08/22	Review memos regarding Clearwater issues. Conference call regarding strategy. 1.0; Review limited objection. Telephone conference M. Gilbert regarding above .3; Review Kahn settlement agreement. Provide comments to counsel .4	1.70	400.00	680.00
06/09/22	Review and respond to emails regarding Hagshama. Review attachments. Telephone conference with M. Gilbert regarding above.	0.50	400.00	200.00
06/16/22	Review and consider various drafts of pleadings. Email comments to counsel.	0.50	400.00	200.00
06/21/22	Review and consider Order regarding motions to dismiss. Emails to counsel regarding above.	0.50	400.00	200.00
06/24/22	Review and consider objection to stay motion. Emails to counsel regarding above and regarding Hershey.	0.50	400.00	200.00

06/28/22	Review and respond to emails regarding Kahn settlement and regarding Hershey offer.	0.40	400.00	160.00
07/11/22	Review Hershey disclosures.	0.20	400.00	80.00
07/27/22	Prepare for and attend conference call with counsel regarding offers and status .8; Review and respond to emails regarding above .2	1.00	400.00	400.00
	Totals for Receiver Time		<hr/>	<hr/>
		14.70		5,880.00
	Report Totals	14.70		5,880.00

Client	Trans Date	Tkpr	Rate	Hours Worked	Hours to Bill	Amount	
Client ID 19461.103 SENDER/HARVEY							
19461.103	11/09/2021	PDV					Attorney A. Andrews fees re: 4/8/2021 - 4/13/2021 and 4/16/2021 written off from 19461.103 and transferred to 19461.106 per Attorney M. Gilbert instruction.
19461.103	11/09/2021	PDV			0	0	Attorney M. Wolf fees re: 4/13/2021 written off from 19461.103 and transferred to 19461.106 per Attorney M. Gilbert instruction.
19461.103	11/09/2021	PDV			0	0	Paralegal S. Khan fees re: 10/22/2021 written off from 19461.103 and transferred to 19461.106 per Attorney M. Gilbert instruction.
19461.103	11/09/2021	PDV			0	0	Paralegal S. Chavez fees re: 5/21/2021 and 6/22/2021 written off from 19461.103 and transferred to 19461.106 per Attorney M. Gilbert instruction.
19461.103	11/09/2021	PDV			0	0	Attorney R. Sternlieb fees re: 3/15/2021, 3/29/2021 and 3/30/2021 written off from 19461.103 and transferred to 19461.106 per Attorney M. Gilbert instruction.
19461.103	11/09/2021	PDV			0	0	Legal Assistant Y. Davis fees re: 5/7/2021, 6/11/2021, 6/18/2021, and 7/8/2021 written off from 19461.103 and transferred to 19461.106 per Attorney M. Gilbert instruction.
19461.103	11/16/2021	PDV			0	0	Courtesy write down applied to Receiver's Sixth Report, Fee Application per Attorney M. Gilbert and Attorney P. Vellone.
19461.103	06/07/2022	PDV		600	0.5	0.5	300 Review Attorney R. Sternlieb and Attorney M. Gilbert Clearwater analysis; conference with Attorney M. Gilbert re: same.
19461.103	06/08/2022	PDV		600	0.7	0.7	420 Telephone conference with Attorney M. Gilbert and Client re: Clearwater; review bankruptcy filings re: same.
19461.103	06/09/2022	PDV		600	0.4	0.4	240 Telephone conference with Attorney M. Gilbert re: Clearwater bankruptcy hearing.
19461.103	06/10/2022	PDV		600	0.2	0.2	120 Review and respond to Attorney M. Gilbert email re: Clearwater bankruptcy hearing.
19461.103	08/16/2022	PDV		600	1	1	600 Conference with Attorney M. Gilbert and S. Drew re: Clearwater claims.
Subtotal for Timekeeper PDV				Billable	2.8	2.8	1680 PATRICK D. VELLONE
19461.103	11/01/2021	MTG		450	4	4	1800 Review file and prepare initial drafts of Sixth Receiver Report and Sixth Fee Application.
19461.103	11/10/2021	MTG		450	0.75	0.75	337.5 Review fee application in response to client comments and revise same; confer with Attorney P. Vellone re: same.
19461.103	11/18/2021	MTG		450	0.25	0.25	112.5 Finalize and prepare to file 6th Receiver report and 6th Fee Application.
19461.103	05/19/2022	MTG		495	2.5	2.5	1237.5 Review/analyze: confer with Mr. Pietrogallo re: Dragul request for additional tax information; prepare spreadsheet analysis re: same; confer with Attorney R. Sternlieb and Ms. Drew re: same.
19461.103	05/26/2022	MTG		495	3.7	3.7	1831.5 Review request from lender to join in 543(b) motion; confer with Ms. Fischer re: same; confer with Attorney R. Sternlieb and client re: same; review pleadings relating to same and draft joinder for filing.
19461.103	06/01/2022	MTG		495	0.2	0.2	99 Confer with Ms. Drew re: tax returns and status of review and production.
19461.103	06/01/2022	MTG		495	0.7	0.7	346.5 Teleconference with Mr. Sender, Attorney R. Sternlieb, and Ms. Drew re: tax return production; edit update to website to reflect Dragul criminal trial date and status of Insider Case.
19461.103	06/02/2022	MTG		495	1	1	495 Prepare for and attend hearing on Clearwater bankruptcy matter re: 543(b) motion.
19461.103	06/06/2022	MTG		495	1	1	495 Review Attorney R. Sternlieb memorandum re: Clearwater; draft email to client [REDACTED]; confer with Mr. Garber re: secured lender's motion for relief from stay.
19461.103	06/07/2022	MTG		495	1.6	1.6	792 Reviewed lender's motion for relief from stay in Clearwater bankruptcy cases and conferred with Attorney R. Sternlieb re: strategy for dealing with same.
19461.103	06/08/2022	MTG		495	1.5	1.5	742.5 Confer with Mr. Sender and Attorney P. Vellone re: Clearwater strategy; review Hagshama and Debtors' objections to lender's relief from stay motion and formulate strategy for hearing.
19461.103	06/09/2022	MTG		495	4.2	4.2	2079 Confer with Brent Cohen, Mr. Sender, and Attorney P. Vellone re: stay relief hearing and our position; attend hearing.
19461.103	06/15/2022	MTG		495	0.8	0.8	396 Attend ruling on Clearwater motion for relief from stay.
19461.103	07/27/2022	MTG		495	0.6	0.6	297 Confer with Ms. Drew re: submitting claim in Clearwater bankruptcy cases.
19461.103	08/16/2022	MTG		495	1	1	495 Confer with Ms. Drew and Attorney P. Vellone re Clearwater claims.
Subtotal for Timekeeper MTG				Billable	23.8	23.8	11556 MICHAEL T. GILBERT
19461.103	06/01/2022	SK		200	0.1	0.1	20 Create ShareFile link for Dragul tax returns and circulate same.
19461.103	06/23/2022	SK		200	0.2	0.2	40 Circulate email of Motion to creditor list.
Subtotal for Timekeeper SK				Billable	0.3	0.3	60 SALOWA KHAN
19461.103	07/27/2022	SBC		200	0.45	0.45	90 Prepare Proofs of Claim for Clearwater bankruptcy cases; send same to Ms. Drew.

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19461.103	08/22/2022	SBC	200	0.4	0.4	80	File proofs of claim in Clearwater matters.
Subtotal for Timekeeper SBC		Billable		0.85	0.85	170	SAVANNA B. CHAVEZ
19461.103	11/02/2021	RAS	295	0.5	0.5	147.5	Emails to/from Paralegal M. Davies and website developer re: ongoing issues with website and resolution; return investor's call and provide update and status.
19461.103	12/16/2021	RAS	295	0.6	0.6	177	Telephone conference with Jon Block re: continuance of criminal trial; emails to/from Attorney M. Gilbert, Attorney P. Vellone and Mr. Sender re: same; email to Paralegal M. Davies re: update to website.
19461.103	04/20/2022	RAS	325	0.4	0.4	130	Review/analyze pleadings filed in Clearwater case re: suggestion of bankruptcy and locate cases on Pacer.
19461.103	04/20/2022	RAS	325	0.2	0.2	65	Communicate (with client) - emails to/from client re: Clearwater entity's filing for bankruptcy.
19461.103	04/20/2022	RAS	325	0.2	0.2	65	Communicate (other external) - email to U.S. Trustee re: Clearwater entities' bankruptcy.
19461.103	05/18/2022	RAS	325	0.7	0.7	227.5	Communicate (in firm) - conference with Attorney M. Gilbert and Ms. Drew re: request for Tax Returns from Dragul's criminal attorney and response to discuss with prosecutor re: same.
19461.103	05/18/2022	RAS	325	1.8	1.8	585	Review/analyze file materials, emails, etc. and draft summary email to Attorney M. Gilbert re: tax return request from Dragul's criminal counsel and points for discussion re: same with prosecutor.
19461.103	05/25/2022	RAS	325	0.4	0.4	130	Telephone conference with counsel for Clearwater secured lender re: bankruptcy and pending motion to excuse turnover.
19461.103	05/25/2022	RAS	325	0.2	0.2	65	Email to Mr. Sender, Attorney P. Vellone and Attorney M. Gilbert attaching pleadings and email from counsel for Clearwater secured lender re: motion to excuse turnover.
19461.103	05/26/2022	RAS	325	0.3	0.3	97.5	Telephone conference with Attorney M. Gilbert re: conference with counsel for Clearwater secured lender.
19461.103	05/26/2022	RAS	325	0.4	0.4	130	Telephone conference with Mr. Sender and Attorney M. Gilbert re: Clearwater Bankruptcy and Secured Lender's pending motion to excuse turnover. and strategy re: same.
19461.103	05/26/2022	RAS	325	0.5	0.5	162.5	Emails to/from Legal Assistant T. Novoa re: preparing Entries of Appearance in Clearwater Case (0.2); review, edit and finalize same and email Legal Assistant T. Novoa for filing (0.3).
19461.103	05/26/2022	RAS	325	0.4	0.4	130	Review objections filed by Hagshama and the Commissioner in the Clearwater Bankruptcy re: Dragul's Motion for Turnover of the Property
19461.103	05/26/2022	RAS	325	0.6	0.6	195	Review draft Joinder in Secured Lender's Motion and email Attorney M. Gilbert with comments and suggestions for inclusion; telephone conference with Attorney M. Gilbert re: same.
19461.103	05/31/2022	RAS	325	0.3	0.3	97.5	Emails to/from Mr. Sender re: Clearwater Bankruptcy filings and other items and conference with Attorney M. Gilbert re: same.
19461.103	06/01/2022	RAS	325	0.2	0.2	65	Telephone conference with Attorney M. Gilbert, Mr. Sender and Ms. Drew re: Tax Return request from Dragul's criminal attorneys.
19461.103	06/01/2022	RAS	325	0.2	0.2	65	Emails to/from Paralegal M. Davies and Attorney M. Gilbert re: updates to receivership website.
19461.103	06/01/2022	RAS	325	0.5	0.5	162.5	Review Joint Report and Debtor's Response to Report filed in Clearwater Bankruptcy and email to Attorney M. Gilbert and Attorney P. Vellone re: same.
19461.103	06/02/2022	RAS	325	0.7	0.7	227.5	Attend and observe hearing in Clearwater Bankruptcy case and conference with Attorney M. Gilbert re: same. (NO CHARGE)
19461.103	06/03/2022	RAS	325	1	1	325	Telephone conference with Attorney M. Gilbert re: Clearwater issues to look at for conference with Bankruptcy Counsel for Clearwater entities; email pleadings re: same to Attorney M. Gilbert; review and analyze pleadings re: same and email summary to Attorney M. Gilbert.
19461.103	06/06/2022	RAS	325	0.5	0.5	162.5	Telephone conference with Attorney M. Gilbert re: Clearwater Bankruptcy and Claims on behalf of Receivership Estate.
19461.103	06/07/2022	RAS	325	0.4	0.4	130	Telephone conference with Attorney M. Gilbert re: Clearwater pleadings recently filed by secured lender and debtor and strategy re: same.
19461.103	06/07/2022	RAS	325	0.7	0.7	227.5	Review Clearwater Secured Lender's Motion for Relief from Stay and Emergency Hearing Motion and Debtor's Response re: same.
19461.103	06/08/2022	RAS	325	0.3	0.3	97.5	Telephone conference with Attorney M. Gilbert re: conference with Mr. Sender and Attorney P. Vellone re: strategy for Clearwater Bankruptcy.
19461.103	06/08/2022	RAS	325	0.3	0.3	97.5	Review Hagshama's Limited Objection to Secured Lender's Motion for Relief from Stay.
19461.103	06/09/2022	RAS	325	0.4	0.4	130	Emails to/from Attorney M. Gilbert re: zoom credentials for evidentiary hearing in Clearwater Bankruptcy case; review Reply filed by Secured Lender and witness and exhibits lists in advance of evidentiary hearing
19461.103	06/15/2022	RAS	325	1.2	1.2	390	Attend and observe hearing in Clearwater Bankruptcy re: oral ruling on Secured Lender's Motion for Relief from Stay; review and edit notes and email same to Attorney M. Gilbert. (NO CHARGE)
19461.103	06/15/2022	RAS	325	0.3	0.3	97.5	Telephone conference with Attorney M. Gilbert re: draft response, Clearwater oral ruling and other items.
19461.103	08/05/2022	RAS	325	0.3	0.3	97.5	Review emails to/from Attorney M. Gilbert and investor/creditor of estate re: claims against Hershey and status of Receivership.
Subtotal for Timekeeper RAS		Billable		12.6	12.6	4062	RACHEL A. STERNLIEB

			Nonbillable	1.9	1.9	617.5	
			Total	14.5	14.5	4679.5	
19461.103	11/02/2021	MRD	150	0.4	0.4	60	Continue website maintenance; email communication with website master.
19461.103	11/04/2021	MRD	150	0.5	0.5	75	Email communication with website master regarding issues; upload pleadings to website; revise language on website.
19461.103	11/11/2021	MRD	150	0.3	0.3	45	Upload multiple pleadings to website.
19461.103	11/12/2021	MRD	150	0.2	0.2	30	Upload pleading to website.
19461.103	11/16/2021	MRD	150	0.1	0.1	15	Telephone conversation with Claimant Owsley.
19461.103	12/06/2021	MRD	150	0.2	0.2	30	Upload pleadings to website.
19461.103	12/16/2021	MRD	150	0.2	0.2	30	Email communication with Attorney R. Sternlieb; revise website language regarding continuance of criminal trial.
19461.103	01/14/2022	MRD	180	0.2	0.2	36	Update website language regarding new criminal trial dates.
19461.103	03/08/2022	MRD	180	0.2	0.2	36	Upload pleading to website.
19461.103	03/14/2022	MRD	180	0.1	0.1	18	Upload pleading to website.
19461.103	04/23/2022	MRD	180	0.3	0.3	54	Post information regarding Hershey indictment and April 22, 2022 hearing on website.
19461.103	06/01/2022	MRD	180	0.5	0.5	90	Draft language for website regarding Status Conference; update criminal trial date on website; revise language on website pursuant to Attorney M. Gilbert request.
19461.103	06/27/2022	MRD	180	0.4	0.4	72	Upload multiple pleadings to website.
19461.103	08/01/2022	MRD	180	0.3	0.3	54	Upload pleading to website; address website issues.
Subtotal for Timekeeper MRD		Billable		3.9	3.9	645	MARILYN R. DAVIES
19461.103	04/25/2022	YMD	180	0.05	0.05	9	Review pleadings, calendar relevant deadlines, and circulate to team (Dkt. no. 171).
Subtotal for Timekeeper YMD		Billable		0.05	0.05	9	YVONNE M. DAVIS
19461.103	05/26/2022	TMN	150	0.4	0.4	60	Prepare Entry of Appearance for Attorney R. Sternlieb and Attorney M. Gilbert in the Clearwater case.
19461.103	05/27/2022	TMN	150	0.15	0.15	22.5	Prepare Entry of Appearance for Attorney R. Sternlieb and Attorney M. Gilbert for the Clearwater Plainfield 15, LLC case.
Subtotal for Timekeeper TMN		Billable		0.55	0.55	82.5	TERRI M. NOVOA
Total for Client ID 19461.103		Billable		44.85	44.85	18264.5	SENDER/HARVEY
		Nonbillable		1.9	1.9	617.5	SENDER-DRAGUL RECEIVERSHIP
		Total		46.75	46.75	18882	
GRAND TOTALS							
		Billable		44.85	44.85	18264.5	
		Nonbillable		1.9	1.9	617.5	
		Total		46.75	46.75	18882	

Detail Cost Transaction File List
Transaction File List - Costs
ALLEN VELLONE WOLF HELFRICH & FACTOR P.C.

Client	Trans Date	C E/A T	Rate	Units	Amount	
Client ID 19461.103 SENDER/HARVEY						
19461.103	11/30/2021	E 2			21.42	Westlaw on-line database research.
19461.103	02/28/2022	E 2			2.98	Westlaw on-line database research.
19461.103	07/31/2022	E 2			96.99	Westlaw on-line database research.
	Subtotal for Expense Type 2			Billable	121.39	ONLINE RESEARCH
19461.103	05/31/2022	E 4			19.56	Delivery - FEDERAL EXPRESS 05/11/22, H. SENDER
	Subtotal for Expense Type 4			Billable	19.56	EXPRESS DELIVERY
19461.103	03/31/2022	E 5			36.73	Filing fee - Colorado Courts E-filing system (CCE)
19461.103	03/31/2022	E 5			15.00	Colorado Courts E-filing system (CCE) - Case History Report
19461.103	04/30/2022	E 5			24.95	Other professionals - 02/20/22, APPS4RENT.COM
19461.103	04/30/2022	E 5			24.95	Other professionals - 03/20/22, APPS4RENT.COM
19461.103	05/31/2022	E 5			24.95	Other WWW.APPS4RENT.COM
	Subtotal for Expense Type 5			Billable	126.58	MISCELLANEOUS
19461.103	11/30/2021	A 0			24.95	WWW.APPS4RENT.COM - SEPTEMBER SERVICES
19461.103	11/30/2021	A 0			24.95	WWW.APPS4RENT.COM - OCTOBER SERVICES
19461.103	12/31/2021	A 0			323.64	BLUEHOST.COM - HOST WEBSITE: DRAGULRECEIVERSHIP.COM
19461.103	01/31/2022	A 0			24.95	APPS4RENT.COM - JANUARY 2022 SERVICES
19461.103	01/31/2022	A 0			24.95	APPS4RENT.COM - DECEMBER 2022 SERVICES
19461.103	02/28/2022	A 0			24.95	WWW.APPS4RENT.COM - JANUARY 2022
19461.103	06/30/2022	A 0			24.95	WWW.APPS4RENT.COM - MAY 2022
19461.103	06/30/2022	A 0			6.38	Conference call services AMERICAN TELECONFERENCING SERVICES, LTD. - 06/01/22, 4X PARTICIPANTS
19461.103	07/31/2022	A 0			24.95	WWW.APPS4RENT.COM - JUNE 2022
19461.103	07/31/2022	A 0			24.95	WWW.APPS4RENT.COM - JULY 2022
19461.103	08/31/2022	A 0			24.95	INDEPENDENT FINANCIAL - WWW.APPS4RENT.COM
	Subtotal for Advance Type 0			Billable	554.57	MISCELLANEOUS
19461.103	11/30/2021	A 1			48.00	Filing fee - Colorado Courts E-filing system (CCE)
19461.103	04/30/2022	A 1			48.00	Filing fee - Colorado Courts E-filing system (CCE) COLORADO INTERACTIVE, LLC
19461.103	05/31/2022	A 1	0.100	687.00	68.70	PACER Public Access to Court Electronic Records
19461.103	06/30/2022	A 1			24.00	Filing fee - Colorado Courts E-filing system (CCE)
19461.103	06/30/2022	A 1			15.00	Colorado Courts E-filing system (CCE) - Case History Report
	Subtotal for Advance Type 1			Billable	203.70	FILING FEE
Total for Client ID 19461.103				Billable	1,025.80	SENDER/HARVEY SENDER-DRAGUL RECEIVERSHIP
GRAND TOTALS						
				Billable	1,025.80	

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FILING ID: C37F6034818AC
CASE NUMBER: 2018CV33011

Detail Cost Transaction File List
 Transaction File List - Costs
 ALLEN VELLONE WOLF HELFRICH & FACTOR P.C.

<u>Client</u>	<u>Trans Date</u>	<u>E/A</u>	<u>T</u>	<u>Rate</u>	<u>Units</u>	<u>Amount</u>	
Client ID 19461.106 SENDER/HARVEY							
19461.106	02/28/2022	E	2			10.81	Westlaw on-line database research.
19461.106	03/31/2022	E	2			57.99	Westlaw on-line database research.
19461.106	05/31/2022	E	2			30.95	Westlaw on-line database research.
19461.106	06/30/2022	E	2			48.26	Westlaw on-line database research.
19461.106	06/30/2022	E	2			121.19	Westlaw on-line database research.
19461.106	07/31/2022	E	2			22.08	Westlaw on-line database research.
19461.106	07/31/2022	E	2			56.50	Westlaw on-line database research.
Subtotal for Expense Type 2						347.78	ONLINE RESEARCH
19461.106	05/31/2022	A	1	0.100	23.00	2.30	PACER Public Access to Court Electronic Records
19461.106	05/31/2022	A	1	0.100	23.00	2.30	PACER Public Access to Court Electronic Records
19461.106	06/30/2022	A	1			84.00	Filing fee - Colorado Courts E-filing system (CCE)
19461.106	06/30/2022	A	1	0.100	11.00	1.10	PACER Public Access to Court Electronic Records
19461.106	07/31/2022	A	1			24.00	Filing fee - Colorado Courts E-filing system (CCE)
19461.106	08/31/2022	A	1			60.00	Filing fee - Colorado Courts E-filing system (CCE)
Subtotal for Advance Type 1						173.70	FILING FEE
19461.106	07/31/2022	A	2			612.50	Professional services - DIGITAL ESI CONSULTING
Subtotal for Advance Type 2						612.50	PROFESSIONAL SERVICE
Total for Client ID 19461.106						1,133.98	SENDER/HARVEY COCCA
GRAND TOTALS							
						1,133.98	



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 FILING CERTIFIED PUBLIC ACCOUNTANTS & BUSINESS CONSULTANTS
 CASE NUMBER: 2018CV33011

ALLEN VELLONE WOLF HELFRICH & FACTOR P.C.
 MICHAEL T. GILBERT
 1600 STOUT STREET
 SUITE 1100
 DENVER, CO 80202

Invoice No. 921973
 Client No. 32501.0005

Date 09/22/2022

RE: Harvey Sender, as Receiver for Gary Dragul, GDA Real Estate Services, LLC, and GDA Real Estate Management, Inc.

Date	Category	Name	Memo	Hours	Standard Rate	Standard Amount	Billed Rate	Billed Amount	Discount
1/19/2022	Tax Preparation	DREW	Year end reporting and 1099 Analysis	2.25	\$497.00	\$1,118.25	\$400.00	\$900.00	(\$218.25)
1/25/2022	Tax Preparation	HILLIARD	Prepared 1099s	0.25	\$189.00	\$47.25	\$175.00	\$43.75	(\$3.50)
1/25/2022	Tax Preparation	WOODRUFF	1099 log in	0.50	\$264.00	\$132.00	\$250.00	\$125.00	(\$7.00)
1/25/2022	Tax Preparation	WOODRUFF	1099 review	0.50	\$264.00	\$132.00	\$250.00	\$125.00	(\$7.00)
1/31/2022	Tax Preparation	WOODRUFF	Finalize 1099s	0.25	\$264.00	\$66.00	\$250.00	\$62.50	(\$3.50)
7/11/2022	Data Production	RUDLOFF	Data duplication and validation support.	2.25	\$609.00	\$1,370.25	\$550.00	\$1,237.50	(\$132.75)
7/14/2022	Data Production	RUDLOFF	Data duplication support	0.50	\$609.00	\$304.50	\$550.00	\$275.00	(\$29.50)
7/15/2022	Data Production	RUDLOFF	Data preparation and duplication	0.50	\$609.00	\$304.50	\$550.00	\$275.00	(\$29.50)
7/18/2022	Bankruptcy Claim	DREW	Call with Mr. Gilbert	1.25	\$497.00	\$621.25	\$400.00	\$500.00	(\$121.25)
7/27/2022	Bankruptcy Claim	DREW	Review documents for claim against Clearwater	2.25	\$497.00	\$1,118.25	\$400.00	\$900.00	(\$218.25)
8/9/2022	Insider Matter	DREW	Discussion on insider case.	1.75	\$497.00	\$869.75	\$400.00	\$700.00	(\$169.75)
8/11/2022	Tax Preparation	DREW	Finalize Work papers for Tax Return	3.25	\$497.00	\$1,615.25	\$400.00	\$1,300.00	(\$315.25)
8/12/2022	Bankruptcy Claim	DREW	Clearwater claim analysis	1.25	\$497.00	\$621.25	\$400.00	\$500.00	(\$121.25)
8/16/2022	Bankruptcy Claim	DREW	Claims Analysis for BK	2.25	\$497.00	\$1,118.25	\$400.00	\$900.00	(\$218.25)
8/19/2022	Bankruptcy Claim	DREW	Claims for Bankruptcy	3.75	\$497.00	\$1,863.75	\$400.00	\$1,500.00	(\$363.75)
8/22/2022	Bankruptcy Claim	DREW	Claims analysis for Plainfield and Clearwater	1.75	\$497.00	\$869.75	\$400.00	\$700.00	(\$169.75)
8/22/2022	Tax Preparation	WOODRUFF	logging in return	0.50	\$264.00	\$132.00	\$250.00	\$125.00	(\$7.00)
8/26/2022	Tax Preparation	WOODRUFF	reviewing work papers and returns	1.00	\$264.00	\$264.00	\$250.00	\$250.00	(\$14.00)
8/30/2022	Tax Preparation	ABRAMOVITZ	Review Tax Return	1.00	\$644.00	\$644.00	\$600.00	\$600.00	(\$44.00)
8/31/2022	Tax Preparation	FYFE	Assembled client return.	0.50	\$149.00	\$74.50	\$125.00	\$62.50	(\$12.00)
			Total	27.50		\$13,286.75		\$11,081.25	(\$2,205.50)

Summary By Project

Category	Hours	Standard Rate	Standard Amount	Billed Rate	Billed Amount	Discount
Bankruptcy Claim Analysis	12.50		\$6,212.50		\$5,000.00	(\$1,212.50)
Data Production	3.25		\$1,979.25		\$1,787.50	(\$191.75)
Insider Matter	1.75		\$869.75		\$700.00	(\$169.75)
Tax Preparation	10.00		\$4,225.25		\$3,593.75	(\$631.50)
Total	27.50		\$13,286.75		\$11,081.25	(\$2,205.50)

Summary By Name

Name	Hours	Standard Rate	Standard Amount	Billed Rate	Billed Amount	Discount
ABRAMOVITZ	1.00	\$644.00	\$644.00	\$600.00	\$600.00	(\$44.00)
DREW	19.75	\$497.00	\$9,815.75	\$400.00	\$7,900.00	(\$1,915.75)
FYFE	0.50	\$149.00	\$74.50	\$125.00	\$62.50	(\$12.00)
HILLIARD	0.25	\$189.00	\$47.25	\$175.00	\$43.75	(\$3.50)
RUDLOFF	3.25	\$609.00	\$1,979.25	\$550.00	\$1,787.50	(\$191.75)
WOODRUFF	2.75	\$264.00	\$726.00	\$250.00	\$687.50	(\$38.50)
	27.50		\$13,286.75		\$11,081.25	(\$2,205.50)

Total Fees Billed \$13,286.75
 Discount 17% (\$2,205.50)
 Expenses: Drives for \$715.38
 Document Request
 Amount Due \$11,796.63

Current Amount Due \$ 11,796.63

Payment is due on receipt. A 1.5% per month service charge will be added to balances remaining unpaid 30 days or more after the invoice date.

Pay online by credit card or ACH Debit: www.rubinbrown.com/payment Starting April 2021, RubinBrown has a new client payment website. You will need your client number and zip code to enroll in RubinBrown Online Billpay.	Send check to: RubinBrown LLP PO Box 790379 St. Louis, MO 63179-0379 Include Client Number and Invoice Number on the check	Wire payment to: Receiving Bank: Enterprise Bank & Trust 150 N Meramec Ave., St. Louis, MO 63105 ABA #081006162 Account Name: RubinBrown LLP Account #139424 Please include the Client Number and Invoice Number in the bank reference or send that information in an email to Billingquestions@rubinbrown.com
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For questions regarding your account, please contact your RubinBrown executive or email your questions to billingquestions@rubinbrown.com.

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